

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF  
GEORGIA ATLANTA DIVISION

RICHARD IRVING BECKMAN, )  
and KARI ANN BECKMAN, )  
Plaintiffs, )  
) CIVIL ACTION FILE NO.  
v. ) 1:23-cv-06000-SEG  
REGINA CAELI, INC., a/k/a )  
REGINA CAELI ACADEMY, )  
Defendant, )

# AFFIDAVIT OF JO ANN BROQUIE

COMES NOW, before the undersigned attesting officer, authorized by law to administer oaths, Jo Ann Broquie, MS, who first being duly sworn, deposes on oath and states as follows.

# 1. *Media Agency*

This Affidavit is given on the basis of my direct, personal knowledge and may be used for any proper purpose therein.

2.

Each of the statements made in this Affidavit are true and correct.

3

My name is Jo Ann Broquie. I am above the age of Eighteen and do not suffer from any mental defects.

4.

I reside in Longview, Texas. I am a Licensed Professional Counselor (“LPC”) and a Licensed Specialist in School Psychology (“LSSP”).

5.

I completed my master’s degree in clinical psychology from the University of Texas at Tyler. In addition, I have passed the requisite state examinations and completed the needed supervised work hours to become a LPC and LSSP.

6.

As a result of my training and education I am able to diagnose individuals with Mental Health Conditions after conducting therapy sessions with them.

7.

Kari Ann Beckman was one of my clients. I diagnosed Ms. Beckman with Complex Post-Traumatic Stress Disorder, Generalized Anxiety Disorder, Panic Disorder, and Other, Specified Anxiety Disorder (Lack of Felt Safety). Further, as our work together evolved, it became clear that Ms. Beckman also has Complex Grief.

8.

Around late March of 2025, Ms. Beckman's attorney reached out requesting I provide all of the documentation I had regarding Ms. Beckman and her diagnoses. I explained that I would need Ms. Beckman to sign a release form and that, after she did so and I received a copy, I would deliver the documentation to them.

9.

Around 2:00 AM on March 27, 2025, I woke up with severe abdominal pain. I assumed that it was some form of food poisoning and that I would get better soon.

10.

The pain was still ongoing around 3:00 PM on March 27, 2025, and in addition I developed a fever. At that point, I decided to go to the emergency room.

11.

By around 9:00 PM on March 27, 2025, I received an emergency appendectomy.

12.

I was out of the office for the next two weeks recovering, after the surgery.

13.

I run a solo practice and would not have been able to send over Ms. Beckman's medical file from the 27<sup>th</sup> to at least the 14<sup>th</sup>.

*[Signature Page Follows]*

**FURTHER THE AFFIANT SAYETH NOT.**

This 22 day of April, 2025

Jo Ann P. Broquie  
JO ANN BROQUIE

**SWORN TO AND SUBSCRIBED  
BEFORE ME, THIS 22 DAY OF  
APRIL, 2025.**

Michelle Cruit  
Notary Public



My commission expires 10-21-2028